

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW  
40 EXCHANGE PLACE  
18TH FLOOR  
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE  
(212) 482-1303 FAX  
WWW.TALKINLAW.COM  
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLCOTT CITY, MD 21042  
410-964-0300

NEW JERSEY OFFICE:  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311  
201-342-6665

May 22, 2023

Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday  
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including electronic monitoring. In the evening of May 24, 2023, Holiday is scheduled to undergo a brain scan that requires removal of his location monitoring bracelet. Pretrial Services (“Pretrial”) has advised me that upon permission of the Court, the supervising district has arranged to remove Hlday’s bracelet just prior to the procedure and replace it shortly after the procedure is complete. Accordingly, defendant respectfully requests that the Court permit removal of the bracelet on May 24, 2023 as directed by Pretrial. The government, by Assistant United States Attorney Jonathan Lax, and Pretrial, by United States Pretrial Officer, Valeria Lopez, consent to this application.

Thank you for Your Honor’s consideration of this request.

Very truly yours,  
*Sanford Talkin*  
Sanford Talkin

cc: AUSA Jonathan Lax (by ECF)  
USPTO Valeria Lopez (by email)